



October 12, 2016

Changing Workplaces Review, ELCPB
400 University Avenue, 12th Floor,
Toronto, ON M7A 1T7
Via email: CWR.SpecialAdvisors@ontario.ca

Attention: Special Advisors
Michael Mitchell and Justice John Murray

Dear Sirs,

Changing Workplaces Review Special Advisors' Interim Report

VPI Working Solutions has carefully and thoughtfully reviewed the Changing Workplaces Review Special Advisors' Interim Report, and is thankful for the opportunity to provide comments and submissions in response to the report.

As a smaller organization with fewer than 200 employees, we pride ourselves on being an employer that for the most part provides a greater benefit than required under the Ontario *Employment Standards Act, 2000*.

Although we recognize the need for a review of current employment practices we are concerned with many of the recommendations put forth in the Interim Report; there are certain recommendations that would impose significant financial burdens on small and medium sized companies and may discourage new business opportunities in the Province. We strongly encourage the Special Advisors to take into consideration the negative impact these proposed recommendations will have on employers.

What follows is VPI's response to the various recommendations set out in the Interim Report:

Section 5.2 Scope and Coverage of the ESA

Subsection 5.2.1 Definition of Employee

Definition of Employee in the ESA

This employer supports Option 5: Maintain the status quo.

Subsection 5.2.3 Exemptions, Special Rules and General Process

This employer supports:

Option 1: Maintain the status quo.

Section 5.3 Standards

5.3.3 Public Holidays and Paid Vacation

Subsection 5.3.3.1 Public Holidays

The employer supports Option 1: Maintain status quo.

Subsection 5.3.3.1 Paid Vacation

The employer supports Option 1: Maintain status quo.

Subsection 5.3.4 Personal Emergency Leave

The employer supports Option 1: Maintain status quo.

Subsection 5.3.5 Paid Sick Days

This employer supports Option 1: Maintain the status quo.

Section 5.3.8 Termination, Severance and Just Cause

Subsection 5.3.8.1 Termination of Employment

This employer supports Option 1: Maintain the status quo.

Subsection 5.3.8.2 Severance Pay

This employer supports Option 1: Maintain the status quo.

Subsection 5.3.8.3 Just Cause

This employer supports Option 1: Maintain the status quo.

Again, VPI Working Solutions appreciates the opportunity to participate in the review of the ESA2000. We are invested in the Changing Workplaces Review and remain optimistic that it will result in improvements to our outdated employment laws, yet provide a fair legislation to employers in Ontario.

We look forward to participating in the next stages in the review and to seeing the final report in the coming year.

Sincerely,
VPI Working Solutions



Grace Paladino
Director, Human Resources